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December 9, 2005

VIA E-FILE AND REGULAR MAIL

The Honorable Joseph J. Farnan, Jr.
United States District Court
District of Delaware
844 N. King Street, Room 4124
Wilmington, DE 19801

**Re: Federal Insurance Company v. Lighthouse Construction
Millers Capital Insurance Co. v. Lighthouse Construction
Factory Mutual Insurance Co. v. Lighthouse Construction
Civil Action Nos. 04-339; 04-1322; and 05-96**

Dear Judge Farnan:

Plaintiffs participated in a mediation with East Coast Erectors, Inc. and Becker Morgan Group yesterday. Magistrate Judge Thyng conducted the mediation. As a result, plaintiffs reached an agreement in principal to settle with each defendant and are endeavoring to draft the release agreements. The settlement leaves O'Donnell, Naccarratto & MacIntosh, Inc. ("ONM") as the sole defendant. Plaintiffs previously settled with Lighthouse Construction, Inc.

The purpose of this letter is to request, on behalf of the settling parties, the Court's indulgence in extending the deadline for filing dispositive motions. The scheduling orders require that Case Dispositive Motions be filed on or before December 16, 2005. The settling parties are requesting that the date be extended for two weeks (through 12/30/05) to allow for the finalization of the agreements reached yesterday. This request does not include extending the deadline on behalf of ONM. That date, under this request, would remain December 16, 2005.

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The settling parties would also request that the Court hold all pending motions in abeyance to allow for the finalization of the settlement agreements. Thank you.

Very truly yours,

WHITE AND WILLIAMS LLP

By: 

Ron L. Pingitore, Esquire

RLP:teb

cc: The Honorable Mary Pat Thyng (via e-mail)
All Counsel via Fax